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IN THE UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

JANE DOE I, *et al.*, Plaintiffs, v. LAKIREDDY BALI REDDY, *et al.*, Defendants.	CASE NO. C-02-5570-WHA **PLAINTIFFS' WITNESS LIST** Pretrial Conf.: March 22, 2004 Time: 2:00 p.m. Place: Courtroom 9, 19th Floor Hon. William H. Alsup Trial Date: March 29, 2004

Plaintiffs Jane Doe II, Jane Doe VII, Sreekanth Kollipara, and Chanti Jyotsna Devi ("Vani") Prattipati (collectively, "Plaintiffs") hereby submit the following witness list for their case-in-chief pursuant to the Court's Guidelines for Trial and Final Pretrial Conference in Civil Jury Cases:

Plaintiffs' Witnesses

1. Jeff Appleman

Jeff Appleman is an attorney in San Francisco specializing in immigration law. Mr. Appleman will provide non-cumulative expert testimony about the immigration laws and processes implicated by the defendants' conspiracy to bring Indian nationals into the United States on the basis of fraudulent visas.

Estimated time: 30 minutes

2. Kevin Bales, Ph.D.

Kevin Bales is a Professor of Sociology at the University of Surrey, London. Dr. Bales will provide non-cumulative expert testimony about the phenomenon of human trafficking.

Estimated time: 1.5 hours

3. George Borjas, Ph.D.

George Borjas is the Robert W. Scrivner Professor of Economics and Social Policy at the John F. Kennedy School of Government, Harvard University. Dr. Borjas will offer expert testimony regarding the extent of economic damages suffered by the individual plaintiffs.

Estimated time: 1.5 hours

4. Rosemary Costa

Rosemary Costa is a probation officer in the Northern District of California. Ms. Costa will offer non-cumulative testimony regarding defendants' criminal proceedings.

Estimated time: 15 minutes

5. Keith A. DeBlasi

Officer DeBlasi is a member of the Berkeley Police Department. He will provide non-cumulative testimony about defendants and their agents' behavior at 2020 Bancroft on

November 24, 1999 and later at Alta Bates Hospital, as well as about what he observed inside Apartment 228 at 2020 Bancroft Way.

Estimated time: 30 minutes

6. Jane Doe II

Jane Doe II is an individual plaintiff. This witness will require a translator.

Estimated time: 4 hours

7. Jane Doe VII

Jane Doe VII is an individual plaintiff. This witness will require a translator.

Estimated time: 2 hours

8. Lakshmi Galireddy

Lakshmi Galireddy is a former employee of the defendants. She will provide non-cumulative percipient witness testimony regarding Jane Doe II and Vani's claims. This witness will require a translator.

Estimated time: 45 minutes

9. Dr. Robert Golomb

Robert Golomb is a doctor at Alta Bates Emergency Room. He treated both Vani and Jane Doe II on November 24, 1999, and will provide non-cumulative testimony thereabout.

Estimated time: 20 minutes

10. Don Henley

Don Henley is an agent with the agency formerly known as the INS. Mr. Henley will provide non-cumulative testimony regarding the investigation of defendants by law enforcement agencies.

Estimated time: 30 minutes

11. Carol Hyland

Ms. Hyland is a vocational rehabilitation expert. She will provide non-cumulative expert testimony regarding Jane Doe II's lifetime work capacity and wage-earning potential.

Estimated time: 30 minutes

12. Dr. Gilbert Kliman

Dr. Kliman, an expert retained by defendants, will provide non-cumulative testimony about his psychiatric evaluation of Jane Doe II. Plaintiffs intend to use his deposition testimony.

Estimated time: 2 hours

13. Sreekanth Kollipara

Mr. Kollipara is an individual plaintiff.

Estimated time: 1 hour, 30 minutes

14. Venkateswara Reddy Lakireddy

Mr. Lakireddy is an individual defendant. Plaintiffs intend to use his deposition testimony.

Estimated time: 30 minutes

15. Vijay Kumar Lakireddy

Mr. Lakireddy is an individual defendant. Plaintiffs intend to use his deposition testimony.

Estimated time: 1 hour, 30 minutes

16. Prasad Lakireddy

Mr. Lakireddy is an individual defendant. Plaintiffs intend to use his deposition testimony.

Estimated time: 1 hour, 30 minutes

17. Jayaprakash Reddy Lakireddy

Mr. Lakireddy is an individual defendant. Plaintiffs intend to use his deposition testimony.

Estimated time: 1 hour

18. Susilpa Lakireddy

Mrs. Lakireddy is the wife of defendant Vijay Lakireddy. She was a percipient witness and will provide non-cumulative testimony to her husband's involvement and elements of plaintiffs Jane Doe VII and Sreekanth Kollipara's claims. This witness may require a translator.

Estimated time: 20 minutes

19. Kay Lantow

Kay Lantow is a retired Berkeley Police Department member who was brought into the investigation in the beginning of 2000. She will provide non-cumulative testimony about the investigation interviews of the victims that she attended in 2000.

Estimated time: 30 minutes

20. Dr. Anna Lembke

Anna Lembke is a board-certified psychiatrist licensed to practice in California, currently a Staff Physician in the Department of Psychiatry and Behavioral Sciences at Stanford University School of Medicine. Dr. Lembke will provide non-cumulative testimony regarding her psychiatric evaluation of Sreekanth Kollipara.

Estimated time: 30 minutes

21. Claudia Locsin

Ms. Locsin was a counselor at the Family Study Center who evaluated Jane Doe II in May of 2001. She will provide non-cumulative testimony as to the emotional impact of defendants' actions upon Jane Doe II.

Estimated time: 20 minutes

22. Calvin Mettler

Mr. Mettler is a Berkeley Fire Department paramedic who was called to the scene of the carbon monoxide poisoning. Mr. Mettler treated a victim and will provide non-cumulative testimony as to his interactions with and observations of the defendants and their agents at 2020 Bancroft Way and later at Alta Bates Hospital.

Estimated time: 30 minutes

23. Paul Meyer

Mr. Meyer is a certified public accountant who has examined defendants' business, payroll, and other records. Mr. Meyer will provide expert testimony regarding defendants' wage practices, accounting practices, and net worth.

Estimated time: 1.5 hours

24. Dr. Harish Murthy

Dr. Murthy is a Telegu-speaking doctor. He was on call for the intensive care unit at Alta Bates Hospital on November 24, 1999. He treated Jane Doe II and spoke with defendants and their agents at the hospital.

Estimated time: 20 minutes

25. Garen Nielsen

Sergeant Nielsen is recently retired from the Berkeley Police Department. He was transferred to this investigation in December of 1999 and will provide non-cumulative testimony that he was present during the January 11 and 14, 2000 interviews of the victims. He was present at the search of L.B. Reddy and Vijay's home on Elmwood in Berkeley. He also arrested L.B. Reddy.

Estimated time: 30 minutes

26. Kalpana Peddibhotla

Ms. Peddibhotla was a volunteer attorney with the ACLU who provided assistance to Jane Doe II and her family. She will provide non-cumulative testimony as to the condition of Jane Doe II and her family after L.B. Reddy's arrest.

Estimated time: 15 minutes

27. Lakshmi Prattipati

Ms. Prattipati is the mother and successor in interest to Chanti Jyotsna Devi ("Vani") Prattipati. She will provide non-cumulative testimony regarding her and her daughters' contact with the defendants and their agents. This witness will require a translator.

Estimated time: 1.5 hours

28. **Jarmani Prattipati**

Mr. Prattipati is the father and successor in interest to Vani Prattipati. He will provide non-cumulative testimony regarding his and his daughters' contact with the defendants and their agents. This witness will require a translator.

Estimated time: 1.5 hour

29. **Len Raphael**

Mr. Rafael is a certified public accountant employed by the defendants. He will provide non-cumulative testimony regarding the defendants' accounting practices.

Estimated time: 30 minutes

30. **Lakireddy Bali ("L.B.") Reddy**

L.B. Reddy is an individual defendant. Plaintiffs intend to use his deposition testimony.

Estimated time: 1 hour, 30 minutes

31. **Joseph G. Sanchez**

Joseph Sanchez is a detective for the Berkeley Police Department who was on the scene at 2020 Bancroft. He will provide non-cumulative testimony of what he observed at the scene and when he interviewed defendants in early December of 1999.

Estimated time: 30 minutes

32. **Dr. Barbara Sommer**

Barbara Sommer is a board-certified psychiatrist licensed to practice in California, currently a Staff Physician in the Department of Psychiatry and Behavioral Sciences at Stanford University School of Medicine. Dr. Sommer will provide non-cumulative testimony regarding her psychiatric evaluation of Jane Doe VII.

Estimated time: 30 minutes

33. **Dr. David Spiegel**

Dr. Spiegel is a board-certified psychiatrist, licensed to practice in California, Willson Professor in the School of Medicine and Associate Chair of Psychiatry and Behavioral

Sciences at Stanford University School of Medicine. Dr. Spiegel will provide non-cumulative expert testimony in the form of a psychiatric evaluation of Jane Doe II.

Estimated time: 1.5 hours

34. **Robert Teebay**

Mr. Teebay is the Senior Crime Scene Technician for the City of Berkeley. He will provide non-cumulative testimony regarding what he observed and photographed inside and outside Apartment #228 at 2020 Bancroft and at Alta Bates Hospital.

Estimated time: 20 minutes

35. **Venkataswara Reddy Thallapareddy**

Venkataswara Reddy Thallapareddy is an employee of defendants' at Jay Construction. He will provide non-cumulative testimony, via deposition, regarding Jane Doe II and Vani Prattipati's work for defendants.

Estimated time: 10 minutes

36. **Venkateswara Reddy Vemireddy**

Venkateswara Reddy Vemireddy is a former employee of the defendants. Plaintiffs believe that Mr. Vemireddy is currently in India and intend to use his deposition in lieu of live testimony. Mr. Vemireddy will provide non-cumulative testimony regarding defendants' conspiracy to transport Jane Doe II and Vani into the United States with the intent to engage in sexual activity with them.

Estimated time: 45 minutes

37. **Kamala Visweswaran, Ph.D.**

Kamala Visweswaran is a Professor of Cultural Anthropology at the University of Texas at Austin. Dr. Visweswaran will provide non-cumulative expert testimony regarding the social, economic, political, historical, and cultural factors in Southeast India that are relevant to this case.

Estimated time: 2 hours

38. **Bob Young**

Bob Young is a retired Berkeley Fire Department paramedic who was called to the scene of the carbon monoxide poisoning. Mr. Young will provide non-cumulative testimony regarding his treatment of Vani Prattipati and regarding what he observed at Alta Bates Hospital following his arrival.

Estimated time: 20 minutes

39. **Allen Yuen**

Allen Yuen is a sergeant for the Berkeley Police Department. Sergeant Yuen will provide non-cumulative testimony regarding his observations inside and outside 2020 Bancroft Way #228 and may be called to authenticate photographs he took at the scene and at Alta Bates Hospital.

Estimated time: 15 minutes

Dated: March 15, 2004

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By ____/s/__________________________
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